

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

DAVITA M. KEY,)
)
Plaintiff,)
)
v.) CIVIL ACT. NO. 2:19-cv-767-ECM
)
HYUNDAI MOTOR MANUFACTURING,)
ALABAMA, LLC, *et al.*,)
)
Defendants.)

DEFENDANT DYNAMIC SECURITY, INC.’S
OBJECTIONS TO PLAINTIFF’S WITNESS LIST

Defendant Dynamic Security, Inc. (“Dynamic”), hereby submits Objections to witnesses identified in Plaintiff’s Witness List (doc. 101) in compliance with the Uniform Scheduling Order (doc. 51) entered November 19, 2021, as amended by the Court’s Order entered March 28, 2022, (Doc. 57).

Dynamic reserves the right to supplement, modify or withdraw any of the objections made herein. In addition, Dynamic reserves the right to interpose objections to any witnesses that may have previously been identified as witnesses by Plaintiff based on pretrial rulings and rulings during the course of the trial and to object to any exhibit not identified by witnesses at trial. Finally, Dynamic reserves the right to interpose a specific objection at trial to any witness that was not previously identified by Plaintiff or was inaccurately described.

**Dynamic's Objection to the Following Witness Plaintiff Will or
May Call at Trial:¹**

Number	Witness Name	Objections
Witness 9	Chris Hargrove	<p>Dynamic objects to the inclusion of Chris Hargrove on the basis that he was not listed on Plaintiff's Initial Disclosures or Amended Disclosures as required by Rules 26(a)(1)(A)(i) and 37(c)(1) of the Federal Rules of Civil Procedure.</p> <p>Hargrove's testimony would be duplicative and no value to the case.</p>

Respectfully submitted,

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¹ Defendant Dynamic set forth its objections to witnesses Plaintiff identified by deposition testimony designation in "Defendant Dynamic Security, Inc.'s Objections to Deposition Testimony Designations filed February 9, 2023. (Doc. 130).

CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that on 9th day of February, 2023, she electronically filed a true and correct copy of the foregoing with the Clerk of Court using the CM/ECF System which will send notification of such filing to:

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